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March 27, 2014

Honorable Christian F. Hummel
United States Magistrate Judge
United States District Court
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

ELECTRONICALLY FILED

Re: *Meanwell v. Hankle, et al.*
13-cv-0624 (GLS/CFH)

Dear Judge Hummel:

As the court is aware, I represent plaintiff, Louise Meanwell, in this matter. Ms. Meanwell is facing criminal charges in New York City which will be going to trial this coming June or July. I have received notice from the attorney representing Ms. Meanwell in that matter that he objects to her being deposed prior to the resolution of the criminal charges. Further, I understand from speaking with Colleen Galligan, counsel for defendants Joseph Leonard and Benedict Conboy, that her areas of inquiry at Ms. Meanwell's deposition will likely touch upon things that may be relevant to her criminal defense.

The likelihood is, then, that Ms. Meanwell's deposition will consist, in great part, of the repeated assertion of her privilege against self-incrimination. This, in turn, will necessitate the request for a second deposition after Ms. Meanwell's criminal matters are resolved. To further complicate the issue, Ms. Galligan advises that she prefers her clients be deposed after plaintiff. To avoid these unnecessary complications, therefore, we respectfully request an extension of the discovery deadline until after my client's criminal trial. I have also confirmed with counsel for Ms. Supovitz, their agreement with this request.

By copy of this letter I am asking Ms. Hankle, Ms. Bump, and Mr. Bump to apprise the court in the undersigned if they have any objection to this request.

Thank you for your consideration.

Respectfully,
/s/
Keith F. Schockmel

KFS/Meanwell/correspondence

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cc: Colleen Galligan, Esq. (via CM-ECF)
Christopher Martin, Esq. (via CM-ECF)
Jacqueline Hankle (via US mail)
Mary Bump (via US mail)
Jason Bump (via US mail)